

January 26, 2021

FILED VIA ECF

Honorable Nicholas G. Garaufis
United States District Judge
United States Courthouse
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States of America v. Lauren Salzman, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

I am writing to you on behalf of my client, Lauren Salzman ("Ms. Salzman"), to respectfully request a modification to the Court's Order Setting Release Conditions ("Bail Order"). *See* Order Setting Conditions of Release, filed July 27, 2018, DKT. 91. Specifically, I am requesting a modification to allow Ms. Salzman to sell one of her two properties encumbered as part of the bail package securing her release. The property that Ms. Salzman seeks to sell is a residence located at 21 Lape Road, Waterford, New York, 12188, which served as Ms. Salzman's primary residence for the last several years. At the government's request, Ms. Salzman recorded a Confession of Judgment with respect to the equity in this property, authorizing the entry of judgment against her and in favor of the United States in the event that she breaches the terms and conditions of her appearance bond.

Ms. Salzman would like to be able to sell this property and use any excess proceeds from the sale to pay off existing debts and assist her with her own living expenses. Notably, Ms. Salzman already has a buyer for this property; and she expects to be able to sell the property within the next thirty (30) days should Your Honor agree to this proposed bail modification.

Should the Court agree to this proposed modification, Ms. Salzman's appearance would still be secured by the \$50,000 cash bail which was posted on July 25, 2018 (DKT. 72), as well as the equity in her second property located in Clifton Park, New York. Additionally, Ms. Salzman has been on electronic monitoring since July 2018, and she has fully complied with her release conditions.

Counsel has spoken with the government and Pretrial Services, and they have no objection to this proposed modification. Should the Court agree to this proposed modification, Ms. Salzman would subsequently seek to remove this property from the Confession of Judgment.

KW LAW

We appreciate the Court's consideration of this request. Should Your Honor have any questions, we will make ourselves available at a date and time convenient to the Court.

Very truly yours,

KW Law, LLP



Andrea S. Tazioli
(602) 609.7367